

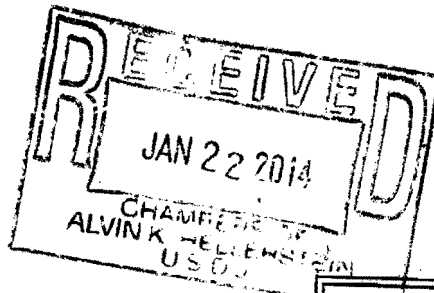
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STANLEY GOOS

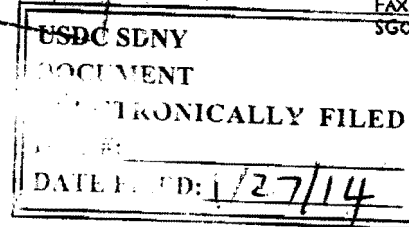
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January 21, 2014



VIA FACSIMILE

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan US Courthouse
500 Pearl Street, Courtroom 14D
New York, NY 10007-1312



RE: In Re: World Trade Center Lower Manhattan Disaster Litigation
1:21-mc-00102-AKH/1:21-mc-00103-AKH
Request to Conduct Milro Services Inc. Deposition after the Discovery
Deadline

Dear Judge Hellerstein:

Harris Beach PLLC is serving as lead defense counsel for the cases of numerous Group I and II plaintiffs. We seek to obtain the deposition of non-party contractor Milro Services Inc. ("Milro") regarding cleaning services performed at 100 Church Street, New York, New York. To this end, we served a Subpoena to Testify at a Deposition on Milro's counsel, Segal McCambridge Singer & Mahoney ("Milro's Counsel"), on December 18, 2013.

We have conferred with Milro's Counsel and they have agreed to produce a corporate witness to testify as to Milro's activities at 100 Church Street. However, because of a full trial schedule throughout January, they are unable to proceed with the deposition before the January 30, 2014 discovery deadline. Please find enclosed as Exhibit "A" an Affidavit of Engagement sworn to by Christian H. Gannon of Segal McCambridge Singer & Mahoney evincing counsel's multiple engagements this month.

As both parties as well as plaintiffs' counsel have consented to proceed with the deposition in February in order to accommodate Milro's Counsel's schedule, we respectfully request the Court's permission to conduct this deposition no later than February 15, 2014.

Thank you for your time and consideration of this matter. If you have any questions, feel free to contact the undersigned.

Very truly yours,

Stanley Goos

*Denial.
The dep'n will proceed
at the place noticed to begin
9:00 a.m. on Jan. 30, 2014, or
if counsel and the court agree,
on another date during the
week beginning Feb. 3, 2014.
1/27/14
Alvin K. Hellerstein*

Hon. Alvin K. Hellerstein
January 21, 2014
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cc: (via electronic mail)

Christopher LoPalo, Esq.

Robert Grochow, Esq.

Gregory Cannata, Esq.

Robert Rigolisi, Esq.

Christopher Gannon, Esq.

Defense Liaison Counsel

Judge wrote:

“Denied. The deposition will proceed at the place noticed to begin 9:00 a.m. on Jan. 30, 2014, or, if counsel and the witness agree, on another date during the week beginning Feb. 3, 2014.

1/27/14

Alvin K. Hellerstein”